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BY CM/ECF

February 9, 2021

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York

RE: *Azor-El, et al. v. City of New York, et al.*, 1:20-cv-03650-KPF (and related cases)
Letter Regarding Pro Hac Vice Admission of Sonal Bhatia

Dear Judge Failla:

This firm represents various Plaintiffs in this pending set of consolidated cases regarding conditions at Rikers Island. My partner, Sonal Bhatia, is seeking admission pro hac vice.

Ms. Bhatia is a member in good standing of the state bars of Missouri and New Mexico, and meets all requirements for admission pro hac vice.

We have obtained a certificate of good standing from Missouri, but despite several inquiries, have not received one back yet from New Mexico.

Given the time-sensitive nature of this proceeding, my partner will be moving orally for admission pro hac vice at the hearing tomorrow, as permitted in situations where time does not permit a written motion.¹

We are filing proposed orders for the Court's consideration. Defendants have confirmed that they have no opposition to the admission of Ms. Bhatia pro hac vice.

Respectfully submitted,

KEENAN & BHATIA, LLC

By: /s/ E.E. Keenan
Attorney for Plaintiffs

Cc: Counsel of Record (by ECF)

¹ <https://www.nysd.uscourts.gov/attorney/prohac>